

1 the effective preparation of counsel and is appropriate in light of the complexity of the case and the
2 restrictions imposed by the current pandemic. *See* 18 U.S.C. § 3161(h)(7)(B)(ii), (B)(iv). The parties
3 further stipulate and agree that the ends of justice served by excluding the time from February 3, 2021,
4 through and including May 5, 2021, from computation under the Speedy Trial Act outweigh the best
5 interests of the public and the defendants in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(ii), (B)(iv).

6 The undersigned Assistant United States Attorney certifies that he has obtained approval from
7 counsel for the defendants to file this stipulation and proposed order.

8 IT IS SO STIPULATED.

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10 DATED: February 15, 2021

/s/
SCOTT D. JOINER
Assistant United States Attorney

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13 DATED: February 15, 2021


/s/
NINA MARINO
Counsel for Defendants Suatac and Perna

1 **~~[PROPOSED]~~ ORDER**

2 Based upon the facts set forth in the stipulation of the parties, the restrictions imposed by the
3 current pandemic, and for good cause shown, the Court finds that failing to exclude the time from
4 February 3, 2021, through May 5, 2021, would unreasonably deny defense counsel and the defendants
5 the reasonable time necessary for effective preparation, taking into account the exercise of due diligence,
6 and is also appropriate in light of the complexity of the case, which the government represents involves
7 thousands of victims and a very large volume of documents. 18 U.S.C. § 3161(h)(7)(B)(ii), (iv). The
8 Court further finds that the ends of justice served by excluding the time from February 3, 2021, through
9 and including May 5, 2021, from computation under the Speedy Trial Act outweigh the best interests of
10 the public and the defendants in a speedy trial. Therefore, and with the consent of the parties, IT IS
11 HEREBY ORDERED that the time from February 3, 2021, through and including May 5, 2021, shall be
12 excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(ii), (B)(iv).

13 IT IS SO ORDERED.

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15 DATED: February 16, 2021

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17 HON. EDWARD M. CHEN
18 United States District Judge
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